

October 8, 2015

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The Honorable Jocelyn D. Boyd  
Chief Clerk/Administrator  
Public Service Commission of South Carolina  
101 Executive Center Drive  
Columbia, SC 29210

Re: 2015-290-C-Petition of the South Carolina Telephone Coalition for a  
Determination that Wireless Carriers are Providing Radio-Based Local  
Exchange Services in South Carolina that Compete with Local  
Telecommunications Services Provided in the State  
Docket No. 2015-290-C

Dear Ms. Boyd:

I am writing on behalf of the South Carolina Telephone Coalition (“SCTC”) regarding the Reply filed by CTIA — The Wireless Association® (“CTIA”) in the above-referenced proceeding. While Commission Reg. 103-829(A) does not specifically provide for responses to replies, we are writing for the limited purpose of responding to specific statements in CTIA’s Reply which we believe are factually incorrect.

CTIA states that SCTC’s Petition “on its face asks the Commission to make a determination pursuant to Subsection (E)(3), not Subsection (E)(2).” Reply at p. 3. Paragraph 3 of SCTC’s Petition sets forth Subsection (E)(2) in its entirety. Furthermore, the Petition asks that the Commission determine that “carriers who offer retail wireless services in South Carolina *are providing telecommunications services in South Carolina, and* that they are providing radio-based local exchange services ....” Petition at pp. 1 and 3. Thus, the Petition quotes the language and requests determinations under *both* Subsections (E)(2) and (E)(3). The Notice issued and published in this docket likewise mirrors that language.

CTIA goes on to argue that the use of Subsection (E)(3) is required because it is a more specific statute than Subsection (E)(2). As argued in our Response to CTIA’s Motion at pp. 5-6, these statutes – which were enacted at the same time as part of the State Telecommunications Act of 1996 – should be read together, with (E)(2) providing the general rule.

In the interest of keeping this letter brief, we will not respond to the other factual misstatements and extraneous new arguments raised in CTIA’s Reply. We

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believe we have fully responded to the main substantive points of the Motion in our initial Response.

Thank you for your assistance in this matter.

Very truly yours,

McNAIR LAW FIRM, P.A.

*Margaret M. Fox by BSW  
✓/express permission*

Margaret M. Fox

MMF:dmf

cc: All counsel of record

BEFORE  
THE PUBLIC SERVICE COMMISSION OF  
SOUTH CAROLINA

Docket No. 2015-290-C

Re: Petition of the South Carolina )  
Telephone Coalition For a )  
Determination That Wireless )  
Carriers are Providing Radio-Based )  
Local Exchange Services in South )  
Carolina that Compete with Local )  
Telecommunications Service )  
Provided in the State )  
\_\_\_\_\_ )

**CERTIFICATE OF SERVICE**

I, Dennie Fyfe, do hereby certify that I have this date served one (1) copy of South Carolina Telephone Coalition's Response to CTIA's Rely to SCTC's Response to the Motion to Dismiss Petition, or, in the Alternative, Expand Scope of Proceeding, and to Suspend Case Schedule upon the following parties of record via USPS, First Class, postage prepaid and via e-mail to:

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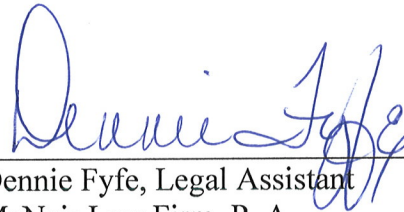
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October 9, 2015

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